

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CORRIONNE LAWRENCE, <i>Plaintiff,</i> vs. CUYAHOGA COUNTY, et al. <i>Defendants.</i>	Case No. 1:19-cv-02411 Judge James S. Gwin Magistrate Judge David A. Ruiz
PLAINTIFF'S PRELIMINARY ESTIMATE OF FEES AND EXPENSES	

Per the Court's order, Doc. No. 7, Plaintiff submits the following preliminary budget projections. This estimate is approximate and anticipates mutual cooperation in discovery. These estimates do not include the costs of any appellate work, including any interlocutory appeals. This preliminary estimate does not factor in the bifurcation of proceedings that Defendants have expressed that they intend to request, which would also necessarily increase the anticipated fees and costs by multiplying and delaying these proceedings.

Attorneys' Fees		Costs	
Preliminary fact investigation and filing complaint	\$75,000	Depositions	\$100,000
Procedural motions practice	\$55,000	Experts	\$50,000
Discovery	\$200,000	Witness Fees	\$2,000
Expert development	\$30,000	ESI vendor	\$20,000
Dispositive motions practice	\$150,000	Travel expenses	\$2,000
Settlement negotiations	\$15,000	Other	\$5,000
Trial (including preparation)	\$250,000		
<i>Estimated fees total</i>	\$775,000	<i>Estimated costs total</i>	\$179,000
		<i>Combined estimate</i>	\$954,000

Dated: December 11, 2019

Respectfully submitted,

THE CHANDRA LAW FIRM LLC

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